

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:18 CR 513
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
vs.)	<u>DEFENDANTS UNOPPOSED</u>
)	<u>MOTION TO PERMIT TRAVEL</u>
TREVOR C. MARLYNE,)	
)	
Defendant.)	

Now comes the Defendant, Trevor C. Marlyne, by and through undersigned counsel, Eric F. Long, Friedman & Nemecek, L.L.C., and hereby respectfully moves this Honorable Court to issue an order permitting Mr. Marlyne to travel outside of the State of Ohio, and, Northern District of Ohio, respectively, for purposes of accompanying his partner, Dr. Alexandra Radu on an employment related trip to Minot, North Dakota. Specifically, Dr. Radu is completing her final year of residency as an oral maxillofacial surgeon and has received a job opportunity in Minot, North Dakota with Trinity Health. Dr. Radu has accepted this position and will be moving to North Dakota in June, 2019. To the extent that he is permitted, Mr. Marlyne intends on joining her on a permanent basis. In anticipation of their move, Dr. Radu and Mr. Marlyne have coordinated with Dr. Radu's hospital to travel to Minot, North Dakota from April 2, 2019 through April 6, 2019 to look for housing¹.

Defendant has discussed the travel plans with his U.S. Pretrial Service Officer, Mr. LaVecchia, and was advised that Mr. LaVecchia has no objections to this travel. Furthermore, Assistant United States Attorney, Aaron Howell, has no objection to the instant request.

¹ Details pertaining to Mr. Marlyne's travel plans, are attached hereto as Exhibit "A."

WHEREFORE, the Defendant, Trevor Marlyne respectfully requests that this Honorable Court modify the terms of his Court Supervised Released by permitting him to travel outside of the State of Ohio, and, the Northern District of Ohio, for the reasons stated herein.

Respectfully submitted,

/s/ Eric F. Long
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ERIC F. LONG (0093197)
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was filed by CM/ECF on the 1st day of April 2019, which will send a notification of such filing electronically to the following:
Assistant United States Attorney, 801 West Superior Avenue, Cleveland, Ohio 44113.

Respectfully submitted,

/s/ Eric F. Long
ERIC F. LONG
Counsel for Defendant

Eric Long

From: Trevor Marlyne <tmarlyne@icloud.com>
Sent: Monday, March 18, 2019 1:01 PM
To: Eric Long
Subject: Fwd: Trinity Health Visit - Minot

Hello!
I hope you had a good St Patrick's Day! Here's the trip information.

Sent from my iPhone

Begin forwarded message:

From: Alexandra Radu <axr576@case.edu>
Date: March 18, 2019 at 12:57:35 PM EDT
To: "tmarlyne@icloud.com" <tmarlyne@icloud.com>
Subject: Fwd: Trinity Health Visit - Minot

----- Forwarded message -----

From: Shar M. Grigsby <Shar.Grigsby@trinityhealth.org>
Date: Mon, Mar 18, 2019 at 12:23 PM
Subject: Trinity Health Visit - Minot
To: Alexandra Radu <axr576@case.edu>

Good Morning! Below is your e-ticket for air travel to Minot. I have reserved a car for you at **Hertz** and a room at the **Sleep Inn & Suites** with Confirmation #[636091690](#)

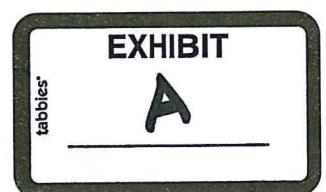
If you need anything further at this time, please be sure to let me know. We will have a "pre-orientation" schedule (for a small portion of your trip) ready for you in the next couple of days.

Shar Grigsby, FASPR, CMSR

Physician Recruiter
Trinity Health
701-857-7860

20 Burdick Expressway West, Minot, ND 58701

trinityhealth.org





Trinity Health is an EEO/AE/Female/Minority/Vet/Disabled Employer

From: Jessica Donamaria - Preferred Travel [mailto:jessica.preferred@midconetwork.com]
Sent: Wednesday, March 06, 2019 2:57 PM
To: Shar M. Grigsby <Shar.Grigsby@trinityhealth.org>
Subject: Radu View Your Itinerary: April 02, 2019

Here you go!



Thank You

Your trip has been booked. To see the details of your trip please click the "View Your Itinerary" button below.



[VIEW YOUR ITINERARY](#)

Tue, Apr 02, 2019 - Cleveland (CLE) to Minneapolis (MSP) - **Confirmed**



Delta Air Lines 2911

Confirmation Number: GSNGWB



DEPART

6:45

AM
CLE

Non Stop

ARRIVE

7:58

AM
MSP

2H 13M

Tue, Apr 02, 2019 - Minneapolis (MSP) to Minot (MOT) - **Confirmed**



Delta Air Lines 3534

Confirmation Number: GSNGWB

 DEPART 9:08 AM MSP Non Stop ARRIVE 10:58 AM MOT
1H 50M

Sat, Apr 06, 2019 - Minot (MOT) to Minneapolis (MSP) - **Confirmed** 

 Delta Air Lines 3538
Confirmation Number: GSNGWB

 DEPART 3:00 PM MOT Non Stop ARRIVE 4:39 PM MSP
1H 39M

Sat, Apr 06, 2019 - Minneapolis (MSP) to Cleveland (CLE) - **Confirmed** 

 Delta Air Lines 0517
Confirmation Number: GSNGWB

 DEPART 8:15 PM MSP Non Stop ARRIVE 11:10 PM CLE
1H 55M

 Help

 Your Reservation Code: 2B7VZF



Phone

701-852-2345



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Regards,

Alex Radu, DMD